

EXHIBIT B

1 A.	Yes and no.	1 A.	Well, there's two ways; either they are appointed by the dealer principal or they're elected by the group.
2 Q.	How "yes" and how "no"?	2	
3 A.	It is a separate entity, but without Cycle-Craft, it wouldn't be there.	3	
4		4 Q.	Okay. And what way is it for the Boston
5 Q.	Okay. And let me focus on the first half of that.	5	Harley Owners Group?
6		6 A.	Both.
7	When you say it's a separate	7 Q.	Okay.
8	entity, do you know whether it's	8 A.	Depending upon what year.
9	incorporated?	9 Q.	Okay. Currently how are the officers for
10 A.	Actually, I think they did at one point. They were trying to incorporate themselves in a separate thing. I don't know whether they ever went through with that, so I can't answer you that honestly.	10	the Boston Harley Owners Group selected?
11		11 A.	Appointed.
12		12 Q.	So, you have made appointments of the
13		13	officers?
14		14 A.	Yes.
15 Q.	All right. As to --	15 Q.	And when did you start doing that?
16 A.	Harley Owners Groups and dealerships kind of work hand and hand. You can't have a Harley Owners Group club unless you're a dealer, and each dealer can only have one Harley Owners Group.	16 A.	Last year.
17		17 Q.	Before last year, how were the officers
18		18	selected for --
19		19 A.	Elected.
20		20 Q.	Let me just finish the question.
21 Q.	Is that something that Harley-Davidson states, to your knowledge?	21 A.	I'm sorry.
22		22 Q.	That's okay.
23 A.	Yes. And the dealership is also responsible for the Harley Owners Group.	23	Before last year, how were the
24		24	officers for the Boston Harley Owners Group

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1 Q.	In what ways?	1	selected?
2 A.	Make sure that they're doing the right thing, riding the straight and narrow and that they're doing -- the purpose of the club is to go out and have fun and be a family-oriented group.	2 A.	They were elected.
3		3 Q.	And for how long were they elected, that is,
4		4	for what period of years that you can
5		5	recall?
6 A.	Two.	6 A.	Two.
7 Q.	But the officers of the Boston Harley Owners Group are not the officers of Cycle-Craft; Is that right?	7 Q.	And prior to that, did you appoint officers
8		8	of the Boston Harley Owners Group?
9		9 A.	Yes.
10	MR. REHNQUIST: Object to the form.	10 Q.	What is it that causes you, if anything, to
11 A.	Sometimes they are and sometimes they aren't.	11	want to make the appointment versus having
12		12	an election?
13 Q.	Today are they?	13 A.	If I feel as though the candidates for the election are dishonest or not.
14 A.	No.	14	
15 Q.	And they are not always; is that correct?	15 Q.	Have there been times when an individual or
16 A.	They aren't always. And other chapters around the country -- of course, you know, we're generalizing here, but other chapters around the country have the owners as the director and they'll have, you know, employees be the officers on the board and some clubs they don't do that at all.	16	individuals that you believed to be
17		17	dishonest have been elected and you have
18		18	chosen to remove those individuals?
19 Q.	How are the officers of the Boston Harley Owners Group selected, to your knowledge?	19 A.	Yes. I should say dishonest and people that also don't follow the guidelines of the Harley Owners Group.
20		20	
21		21	So, there have been occasions where you've
22		22	had to step in and appoint your own
23		23	officers for those reasons you've just
24		24	